EXHIBIT H

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

SOVERAIN SOFTWARE LLC,   )
    Plaintiff,   )
)
)
)
         v.   )   Civil Action No. 6:07-CV-00511-LED
CDW CORPORATION,   )
NEWEGG INC.,   )
REDCATS USA, INC.   )
SYSTEMAX INC.,   )
ZAPPOS.COM, INC.,   )
REDCATS USA, L.P.,   )
THE SPORTSMAN'S GUIDE, INC., AND   )
TIGERDIRECT, INC.,   )
    Defendants.   )
)
)
)

SOVERAIN'S RESPONSES AND OBJECTIONS TO
DEFENDANTS' FIRST SET OF INTERROGATORIES

Pursuant to Rule 33 of the Federal Rules of Civil Procedure, Plaintiff Soverain Software

LLC ("Soverain") hereby objects and responds to the First Set of Interrogatories of defendants

CDW Corporation, Newegg Inc., Systemax Inc., Zappos.com, Inc., Redcats USA, L.P., The

Sportsman's Guide, Inc. and TigerDirect, Inc. (collectively, "Defendants").

GENERAL OBJECTIONS

1.   Soverain objects to the Interrogatories in their entirety to the extent they

seek information that is protected by the attorney-client privilege, work-product doctrine, or any

other privilege, immunity, or protection afforded by law.

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'492 PATENT	Pathfinder
collections of products, and	described above in element 34d. A shopping cart is a stored representation of a collection of products.
[35l] the shopping cart computer being a computer that modifies the stored representations of collections of products in the database.	When a customer adds a product to a shopping cart by clicking a link associated with that product, the shopping cart computer modifies the customer's shopping cart to include the new product, as shown in the code referenced above in element 34h.

C.   The '639 Patent

1.   Transact

Soverain's Transact product incorporates or reflects each asserted claim of the '639

Patent. Soverain directs Defendants to the claim chart below, which describes on an element-by-

element basis how representative asserted claims 1 and 78 of the '639 Patent cover Soverain's

Transact product.

'639 PATENT	Transact
1[a]. A method of processing service requests from a client to a server system through a network, said method comprising the steps of	The Transact software enables the operation of a server system. The server system is accessible to a client over the Internet, a network. The Transact software enables the processing of service requests from the client to the server system.
[1b] forwarding a service request from the client to the server system, wherein communications between the client and server system are according to hypertext transfer protocol;	A service request is forwarded from the client to the server system using the hypertext transfer protocol.
[1c] returning a session identifier from the server system to the client, the client storing the session identifier for use in subsequent distinct requests to the server system; and	The server system issues a session identifier, as shown in, for example, omhttpd-ticket/sid.c,v (seen by expanding SVN2-0053138/ticket.zip), either (i) by returning it within a URL or (ii) by returning it within a cookie. The client runs a browser that is programmed to store the URL or the cookie and therefore the session identifier for use in subsequent distinct requests to the server

'639 PATENT	Transact
	system.
[1d] appending the stored session identifier to each of the subsequent distinct requests from the client to the server system.	The stored session identifier is appended to each of the subsequent distinct requests from the client to the server system either (i) by including the session identifier in the URL that is sent from the client to the server system or (ii) by sending the cookie that contains the session identifier from the client to the server system.
78[a]. A method of processing, in a server system, service requests from a client to the server system through a network, said method comprising the steps of:	The Transact software enables the operation of a server system. The server system is accessible to a client over the Internet, a network. The Transact software enables the processing, in the server system, of service requests from the client to the server system.
[78b] receiving, from the client, a service request to which a session identifier stored at the client has been appended by the client, wherein communications between the client and server system are according to hypertext transfer protocol;	The server system issues a session identifier, as shown in, for example, omhttpd-ticket/sid.c,v (seen by expanding SVN2-0053138/ticket.zip), either (i) by returning it within a URL or (ii) by returning it within a cookie. The client runs a browser that is programmed to store the URL or the cookie and therefore the session identifier. The stored session identifier is appended to a service request from the client to the server system either (i) by including the session identifier in the URL that is sent from the client to the server system or (ii) by sending the cookie that contains the session identifier from the client to the server system. The server system receives that request. The communications between the server system and client are according to hypertext transfer protocol.
[78c] validating the session identifier appended to the service request; and	The server system validates the session identifier as shown in, for example, omhttpd-ticket/sid.c,v (seen by expanding SVN2-0053138/ticket.zip). Validation includes, for example, checking that the session identifier has not expired.
[78d] servicing the service request if the appended session identifier is valid.	The server system validates the appended session identifier according to the procedure

'639 PATENT	Transact
	described in element 78b and services the request only if the appended session identifier is valid.

2.   Pathfinder

Soverain's Pathfinder professional services project incorporates or reflects asserted claims 1, 3, 10, 47, 60, 62, 65, 66, 68, 78 and 79 of the '639 Patent. Soverain directs Defendants to the claim chart below, which describes on an element-by-element basis how representative asserted claims 1 and 78 of the '639 Patent cover Soverain's Pathfinder professional services project.

'639 PATENT	Pathfinder
1[a]. A method of processing service requests from a client to a server system through a network, said method comprising the steps of	The Pathfinder software enables the operation of a server system. The server system is accessible to a client over the Internet, a network. The Pathfinder software enables the processing of service requests from the client to the server system.
[1b] forwarding a service request from the client to the server system, wherein communications between the client and server system are according to hypertext transfer protocol;	A service request is forwarded from the client to the server system using the hypertext transfer protocol.
[1c] returning a session identifier from the server system to the client, the client storing the session identifier for use in subsequent distinct requests to the server system; and	The server system issues a session identifier, as shown in, for example, pf_root/auth/omhttpd/sun/ticket.c (seen by expanding SOVSRC0002/pf_root.zip), by returning it within a URL. The client runs a browser that is programmed to store the URL and therefore the session identifier for use in subsequent distinct requests to the server system.
[1d] appending the stored session identifier to each of the subsequent distinct requests from the client to the server system.	The stored session identifier is appended to each of the subsequent distinct requests from the client to the server system by including the session identifier in the URL that is sent

'639 PATENT	Pathfinder
	from the client to the server system.
78[a]. A method of processing, in a server system, service requests from a client to the server system through a network, said method comprising the steps of:	The Pathfinder software enables the operation of a server system. The server system is accessible to a client over the Internet, a network. The Pathfinder software enables the processing, in the server system, of service requests from the client to the server system.
[78b] receiving, from the client, a service request to which a session identifier stored at the client has been appended by the client, wherein communications between the client and server system are according to hypertext transfer protocol;	The server system issues a session identifier, as shown in, for example, · pf_root/auth/omhttpd/sun/ticket.c (seen by expanding SOVSRC0002/pf_root.zip), by returning it within a URL. The client runs a browser that is programmed to store the URL and therefore the session identifier. The stored session identifier is appended to a service request from the client to the server system by including the session identifier in the URL that is sent from the client to the server system. The server system receives that request. The communications between the server system and client are according to hypertext transfer protocol.
[78c] validating the session identifier appended to the service request; and	The server system validates the session identifier as shown in, for example, pf_root/auth/omhttpd/sun/ticket.c (seen by expanding SOVSRC0002/pf_root.zip) (Open Market web server) or pathfinder-versions/httpd/httpd_1.3/src/http_ticket.c-rev1.3 and pathfinder-versions/httpd/httpd_1.3/src/http_auth.c-rev1.1 (both seen by expanding SOVSRC0002/pf-versions.zip) (modified httpd web server). Validation includes, for example, checking that the session identifier has not expired.
[78d] servicing the service request if the appended session identifier is valid.	The server system validates the appended session identifier according to the procedure described in element 78b and services the request only if the appended session identifier is valid.

3.   OM-Axcess

Soverain's OM-Axcess product incorporates or reflects asserted claims 1, 3, 10, 47, 63, 78 and 79 of the '639 Patent. Soverain directs Defendants to the claim chart below, which describes on an element-by-element basis how representative asserted claims 1 and 78 of the '639 Patent cover Soverain's OM-Axcess product.

'639 PATENT	OM-Axcess
1[a]. A method of processing service requests from a client to a server system through a network, said method comprising the steps of	The OM-Axcess software enables the operation of a server system. The server system is accessible to a client over the Internet, a network. The OM-Axcess software enables the processing of service requests from the client to the server system.
[1b] forwarding a service request from the client to the server system, wherein communications between the client and server system are according to hypertext transfer protocol;	A service request is forwarded from the client to the server system using the hypertext transfer protocol.
[1c] returning a session identifier from the server system to the client, the client storing the session identifier for use in subsequent distinct requests to the server system; and	The server system issues a session identifier, as shown in, for example, omhttpd-ticket/sid.c,v (seen by expanding SVN2-0053138/ticket.zip), either (i) by returning it within a URL or (ii) by returning it within a cookie. The client runs a browser that is programmed to store the URL or the cookie and therefore the session identifier for use in subsequent distinct requests to the server system.
[1d] appending the stored session identifier to each of the subsequent distinct requests from the client to the server system.	The stored session identifier is appended to each of the subsequent distinct requests from the client to the server system either (i) by including the session identifier in the URL that is sent from the client to the server system or (ii) by sending the cookie that contains the session identifier from the client to the server system.
78[a]. A method of processing, in a	The OM-Axcess software enables the

'639 PATENT	OM-Axcess
server system, service requests from a client to the server system through a network, said method comprising the steps of:	operation of a server system. The server system is accessible to a client over the Internet, a network. The OM-Axcess software enables the processing, in the server system, of service requests from the client to the server system.
[78b] receiving, from the client, a service request to which a session identifier stored at the client has been appended by the client, wherein communications between the client and server system are according to hypertext transfer protocol;	The server system issues a session identifier, as shown in, for example, omhttpd-ticket/sid.c,v (seen by expanding SVN2-0053138/ticket.zip), either (i) by returning it within a URL or (ii) by returning it within a cookie. The client runs a browser that is programmed to store the URL or the cookie and therefore the session identifier. The stored session identifier is appended to a service request from the client to the server system either (i) by including the session identifier in the URL that is sent from the client to the server system or (ii) by sending the cookie that contains the session identifier from the client to the server system. The server system receives that request. The communications between the server system and client are according to hypertext transfer protocol.
[78c] validating the session identifier appended to the service request; and	The server system validates the session identifier as shown in, for example, omhttpd-ticket/sid.c,v (seen by expanding SVN2-0053138/ticket.zip). Validation includes, for example, checking that the session identifier has not expired.
[78d] servicing the service request if the appended session identifier is valid.	The server system validates the appended session identifier according to the procedure described in element 78b and services the request only if the appended session identifier is valid.

II.   **"[D]escribe with full particularity the facts and circumstances under which those instrumentalities were tested, sold, offered for sale, and disclosed to any person who was not an employee of Soverain or any of its predecessors prior to the respective effective filing dates of each patent"**

A.   Transact

The earliest version of Transact was first privately disclosed and used between June and September 1994, and first offered for sale in October 1994.

B.   Pathfinder

Soverain's Pathfinder professional services project was first privately disclosed and used sometime between late 1994 and early 1995, and first offered for sale in February 1995.

C.   OM-Axcess

Soverain's OM-Axcess product was first disclosed and used sometime between late 1995 and early 1996, and first offered for sale in March 1996.

III.   **"[I]dentify all persons likely to have related, discoverable information concerning the subject of this interrogatory"**

All persons likely to have discoverable information have been identified by Soverain in its Initial Disclosures of March 20, 2008.

IV.   **"[I]dentify all related documents and things"**

Reasonably related nonobjectionable documents and things of which Soverain was aware prior to May 6, 2008, were produced pursuant to the Court's Discovery Order on or before that date. Soverain will also produce with the present interrogatory responses additional documents that Soverain learned of in the course of preparing the present interrogatory responses and that are responsive to this category. Such documents are contained on the CDs identified by production numbers SVN2-0053138 and SVN2-0053139.